ES BANKRUPTCY COURT DISTRICT OF NEW YORK
) Chapter 7) Case No. 8-13-74235-dte ()

DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING THE TIME TO FILE SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES, SCHEDULE B, SCHEDULE C, SCHEDULE F, SCHEDULE J, DECLARATION CONCERNING DEBTOR(S) SCHEDULES

The above-captioned debtor and debtor-in-possession (the "Debtor"), hereby moves this Court (the "Motion"), pursuant to section 105(a) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for the entry of an Order granting the Debtor additional time to file its Summary of Schedules, Statistical Summary of Certain Liabilities, Schedule B, Schedule C, Schedule F, Schedule J, Declaration Concerning Debtor(s) Schedules (the "Schedules and Statements"). In support of this Motion, the Debtor respectfully states as follows:

Jurisdiction and Venue

1) This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

- 2) On August 15, 2013 (the "Petition Date"), the Debtor filed its voluntary petition in this Court for relief under chapter 7 of the Bankruptcy Code.
- 3) On the Petition Date, the debtor filed a Certificate of Credit Counseling, Application to Proceed in forma pauperis, Creditor Matrix, Statement Pursuant to Local Bankruptcy Rule

1073-2(b), Notice to Individual Consumer Debtor Under § 342 (b) of the Bankruptcy Code, and Statement of Social Security Number.

Relief Requested

- 4) Pursuant to Bankruptcy Rule 1007(c), the Debtor's Schedules and Statements must be filed within fourteen (14) days after the Petition Date. Accordingly, the Debtor is required to file its Schedules and Statements by August 29, 2013 (the "Current Filing Deadline"). By this Motion, the Debtor seeks entry of an Order granting the Debtor an additional fourteen (14) days to file its Schedules and Statements, or through and including September 11, 2013.
- 5) Such relief will provide the Debtor a total of twenty-eight (28) days from the Petition Date to file its Schedules and Statements. The Debtor requests such an extension without prejudice to its ability to request additional extensions.

Basis for Relief Requested

- 6) Pursuant to Bankruptcy Rule 1007(c), the Court may extend the time within which the Debtor must file its Schedules and Statements upon a showing of "cause." Fed. R. Bankr. P. 1007(c). Here, the Debtor does not believe that there is sufficient time to complete the Schedules and Statements by the Current Filing Deadline, and rather than filing incomplete documents that would require amendments at a later date, the Debtor seeks an extension of time to complete this task.
- 7) The Debtor respectfully submit that "cause" exists to extend the Current Filing Deadline by an additional thirty (14) days, or through and including September 11, 2013. To prepare the Schedules and Statements, the Debtor would have to compile information from records, and documents related to the claims of a substantial number of creditors. This information is voluminous and assembling the necessary information would require a significant expenditure of time and effort on the part of the Debtor, who has recently been ill and is currently being

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treated and examined for an unspecified illness, yet to be diagnosed by his physicians. This has left the debtor with limited energy for the effort to complete the Schedules and Statements.

8) Finally, Courts in this district have routinely granted relief similar to that requested herein.

Notice

9) Notice of this motion has been given to the following parties or to their counsel, if known: (i) the Office of the United States Trustee. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

Dated: August 27, 2013

By:

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